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[Additional Counsel Listed on Next Page]	

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA GONZÁLEZ, FREDDY JOSE ARAPE RIVAS, M.H., CECILIA DANIELA GONZÁLEZ HERRERA, ALBA CECILIA PURICA HERNÁNDEZ, E.R., HENDRINA VIVAS CASTILLO, A.C.A., SHERIKA BLANC, VILES DORSAINVIL, and G.S.,	Case No. 3:25-cv-01766-EMC
Plaintiffs,	**STIPULATION REGARDING DISCOVERY OF ELECTRONICALLY STORED INFORMATION**
vs.	
KRISTI NOEM, in her official capacity as Secretary of Homeland Security, UNITED STATES DEPARTMENT OF HOMELAND SECURITY, and UNITED STATES OF AMERICA,	
Defendants.	

Additional Counsel for Plaintiffs

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1. PURPOSE

This Order will govern discovery of electronically stored information ("ESI") in this case as a supplement to the Federal Rules of Civil Procedure, this Court's Guidelines for the Discovery of Electronically Stored Information, and any other applicable orders and rules.

2. COOPERATION

The parties are aware of the importance the Court places on cooperation and commit to cooperate in good faith throughout the matter consistent with this Court's Guidelines for the Discovery of ESI.

3. PRESERVATION

The parties have discussed preservation obligations, and each has agreed to comply with applicable law regarding the scope of information and documents that must be preserved during the pendency of litigation. The duty to preserve encompasses, among other things, relevant electronic messages / communications / documents, proportional to the needs of the case.[1] The parties acknowledge that the duty to preservation of relevant ESI also includes an obligation to turn off any applicable automatic-delete feature that could result in the loss of potentially discoverable documents.

4. SEARCH

The parties agree that in responding to an initial Fed. R. Civ. P. 34 request, or earlier if appropriate, they will meet and confer about methods to search ESI in order to identify ESI that is subject to production in discovery and filter out ESI that is not subject to discovery.[2] To the extent the parties use technology assisted review ("TAR") to limit documents for review and production, the party using TAR will notify the opposing party of its use of TAR. The party using TAR shall provide the following information:

a.   The vendor being used to manage the application of the technology, if any;

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[1] Appendix A includes a list of custodians identified by Plaintiffs to Defendants whom Plaintiffs assert should preserve materials, in addition to any other individuals known by Defendants to be reasonably likely to possess documents relevant to the claims and defenses in the litigation.

[2] Appendix A includes a set of Plaintiffs' proposed search terms. Defendants have not and are not now stipulating to the production of ESI based upon these terms.

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b.   The TAR software being used and the methodology used to train the TAR process;

c.   The method for validating the TAR results.

The party using TAR shall also provide the opposing party a significantly random sample of documents that would be not produced to validate the TAR methodology. Nothing in this order shall be construed to require a party to use any particular search and review methodology. The parties agree to meet and confer, as necessary, regarding search methodology.

5.   PRODUCTION FORMATS

1.   <u>Databases and Other Structured or Semi-Structured Data ("Data Repositories")</u>. A producing party may produce relevant information from such Data Repositories in an already existing and reasonably available report, as an export in a reasonably usable form (e.g., Microsoft Excel, Microsoft Access, or .csv), or as raw data mirroring the underlying storage format (e.g., JSON or delimited text files). A producing party will accommodate reasonable requests to provide query parameters or other search criteria and data definitions used to produce exports or reports. A producing party need not provide a data dictionary where none exists in the ordinary course of business.

2.   <u>Natives</u>. File types which do not render in a usable manner when converted to image with extracted text, such as spreadsheets files, PowerPoint files, and multimedia files, shall be produced in their native format.

3.   <u>Form of production</u>. Responsive ESI and imaged hard copy shall be produced in the format outlined below in Appendix B. All ESI shall be rendered to TIFF image format (300 dpi, 1 bit, single-page TIFF files, CCITT Group IV (2D Compression)), and accompanied by an Opticon/Concordance® Image Cross Reference file. All applicable metadata/database (Appendix B) shall be extracted and provided in Concordance® load file format. In the event that such form is not reasonably feasible, the producing party shall produce the ESI in a reasonable form.

a.   <u>Families</u>. Parent-child relationships for all ESI (e.g., the association between an attachment and its parent email, or a spreadsheet embedded within a word processing document), must be preserved by assigning sequential Bates numbers to all items within the parent-child group

1 and identifying those Bates numbers in the relevant ESI metadata and coding fields. To the extent

2 that a party produces any ESI, the parties will produce responsive ESI intact at the family level,

3 including all attachments; however, a party need not produce attachments to items included on a

4 privilege log unless they are responsive, unique, material, and not privileged.

5   b.   De-duplication. Each party is required to produce only a single copy of a

6 responsive document, and each party may de-duplicate responsive ESI (including de-duplicating

7 based on MD5, SHA-1, or SHA-256 hash values; conversation ID, sender/recipient, and/or

8 date/time sent metadata; or other metadata or de-duplication processes) across custodians or

9 sources. De-duplication of exact hash copies shall be performed globally – across all custodians.

10 The custodian of each record shall be populated in the DupeCustodian field. De-duplication should

11 be performed by document family, not by an individual document. However, each alteration of a

12 document, including handwritten notes, comments, or forwarded versions of a document, will be

13 considered a separate document.

14   c.   Time Zone. All dynamic date and time fields, where such fields are

15 processed to contain a value, and all metadata pertaining to dates and times, will be standardized to

16 Coordinated Universal Time (UTC).

17   d.   Text Messages & Chats. Text messages, enterprise chat messages, and

18 mobile messaging application messages will be united by conversation into 24-hour segments

19 (midnight to midnight) with each segment constituting a separate document.

20   e.   Hyperlinks. Hyperlinks within an email or document will be considered

21 attachments if the system containing the email or document is capable of being configured to cross-

22 reference and collect emails and documents in its existing configuration. The producing party must

23 make good faith efforts to identify and produce the linked document to the extent it is within the

24 producing party's possession, custody, and control, and subject to privilege. To the extent

25 hyperlinks are collected and available, the producing party may produce one copy of the

26 hyperlinked document to the extent feasible in the following order: the version linked, and if not

27 available, the most current version or other alternative as practicable.

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       f.   Redactions. Where ESI items need to be redacted, the ESI items shall be produced in TIFF with the OCR text of the redacted TIFF and with each redaction clearly indicated on the face of the TIFF. The producing party will also provide data fields specified in Appendix B to the extent that such fields can be provided for all redacted documents without individualized privilege review and redaction.

6. PRIVILEGE LOG

Each document withheld in whole or in part from production based on a claim of privilege must be logged in accordance with the Federal Rules of Civil Procedure and governing case law.

7. MODIFICATION

This Stipulated Order may be modified by a Stipulated Order of the parties or by the Court for good cause shown.

IT IS SO STIPULATED, through Counsel of Record.

Dated: April 29, 2025   */s/ EmiLou MacLean*
                            Counsel for Plaintiffs

Dated: April 29, 2025   */s/ William H. Weiland*
                            Counsel for Defendants

STIPULATED ORDER RE: DISCOVERY OF ELECTRONICALLY STORED INFORMATION
CASE NO. 3:25-CV-01766-EMC

1   **IT IS ORDERED** that the forgoing Agreement is approved.

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    Dated:

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                       UNITED STATES DISTRICT JUDGE

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STIPULATED ORDER RE: DISCOVERY OF ELECTRONICALLY STORED INFORMATION
CASE NO. 3:25-CV-01766-EMC

1   Date: April 29, 2025   Respectfully submitted,

2   CENTER FOR IMMIGRATION LAW AND   YAAKOV M. ROTH
    POLICY, UCLA SCHOOL OF LAW   Acting Assistant Attorney General
3   Civil Division

4   /s/ *Emilou MacLean*   SARAH L. VUONG
5   Ahilan T. Arulanantham   Assistant Director
    Stephany Martinez Tiffer

6   ANNA L. DICHTER
    Emilou MacLean   JEFFREY HARTMAN
7   Michelle (Minju) Y. Cho   LAUREN BRYANT
    Amanda Young   CATHERINE ROSS
8   ACLU FOUNDATION   LUZ MARIA RESTREPO
    OF NORTHERN CALIFORNIA   ERIC MICHAEL SNYDERMAN
9   Trial Attorneys

10 Eva L. Bitran
    ACLU FOUNDATION   /s/ *William H. Weiland*
11 OF SOUTHERN CALIFORNIA   WILLIAM H. WEILAND
                                                  Senior Litigation Counsel
12 Jessica Karp Bansal   Office of Immigration Litigation
13 Lauren Michel Wilfong (*Pro Hac Vice*)   Civil Division
    NATIONAL DAY LABORER ORGANIZING   U.S. Department of Justice
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    HAITIAN BRIDGE ALLIANCE   Email: william.h.weiland@usdoj.gov
16
17 Attorneys for Plaintiffs   Attorneys for the Defendants

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21   **SIGNATURE ATTESTATION**

22   Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have

23 concurred in the filing of this document.

24

25   ACLU FOUNDATION
                                                  OF NORTHERN CALIFORNIA
26
                                                  /s/ *Emilou MacLean*
27   Emilou MacLean

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                                          2
    STIPULATED ORDER RE: DISCOVERY OF ELECTRONICALLY STORED INFORMATION
                       CASE NO. 3:25-CV-01766-EMC

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Appendix A

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I.   <u>**Custodians For Preservation**</u>[3]

A. **Individuals Identified as Involved In TPS Decisions Based on Administrative Record Productions**
- Senior Counselor Rob Law
- Senior Advisor Jimmy Percival
- Senior Advisor Joseph Mazzara
- Senior Advisor Joseph Guy
- Senior Advisor Troup Hemenway
- Senior Advisor Troy Edgar
- Chief Advisor Corey Lewandowsky

B. **USCIS**
  - A. Director (or Senior Official Performing the Duties of the Director)
    - Jennifer Higgins – Jan. 20, 2025 - Feb. 8, 2025
    - Kika Scott – Feb. 9, 2025 - present
  - B. Chief of Staff of Director
    - Aaron Calkins – Jan. 20, 2025 - present
  - C. Chief of Office of Policy and Strategy (OP&S)
    - Samantha Deshommes - Jan. 20, 2025 - present
  - D. Senior Policy Advisor(s) or Policy Advisor(s) to Chief of Office of Policy and Strategy (with a role related to TPS)
  - E. Associate Director, International and Humanitarian Affairs (or International and Refugee Affairs)
  - F. Associate Director, External Affairs Directorate (EAD)
    - Carrie Selby – Jan. 20, 2021 – present (acting or appointed)
  - G. Director, Refugee, Asylum and International Operations Directorate (RAIO)
  - H. Associate Director, Refugee, Asylum and International Operations Directorate (RAIO)
    - Ted Kim – Sept. 13, 2021 – present (acting or appointed)
  - I. Research Unit, Refugee, Asylum and International Operations Directorate (RAIO)
  - J. Chief Counsel
    - John Miles - Jan. 20, 2025 - present
  - K. Associate Director, Service Center Operations Directorate
    - Connie Nolan – Feb. 22, 2023 - present
  - L. TPS Subject Matter Experts

C. **Department of Homeland Security**
  - A. Secretary
    - Kristi Noem

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[3] This list is non-exhaustive and is not intended to exclude from Defendants' preservation obligation any other individuals known or reasonably likely to possess documents relevant to the claims and defenses in the litigation. Defendants have not and are not now stipulating to production of ESI from all of the listed custodians.

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STIPULATED ORDER RE: DISCOVERY OF ELECTRONICALLY STORED INFORMATION
CASE NO. 3:25-CV-01766-EMC

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B. Chief of Staff to Secretary
C. Deputy Secretary
   - Troy Edgar
D. Advisor or Senior Advisor (with a role related to TPS)
E. General Counsel
   - Joseph Mazzara
F. Under Secretary, Management
   - Benjamin Huffman (Senior Official Performing the Duties)
G. Under Secretary, Office of Strategy, Policy, and Plans
   - Christopher C. Pratt (Senior Official Performing the Duties)
H. Assistant Secretary for Counterterrorism, Threat Prevention and Law Enforcement, Office of Strategy, Policy and Plans (OSPP)
I. Assistant Secretary, Office of Public Affairs
   - Tricia McLaughlin
J. Principal Deputy Assistant Secretary for Media Relations,
   - Harry Fones
K. Under Secretary, Office of Intelligence and Analysis
   - Daniel Tamburello (Senior Official Performing the Duties)
L. Executive Associate Director, Enforcement and Removal Operations
   - Tom Homan

D. Department of State

A. Secretary
   - Marco Rubio – Jan. 21, 2025 - present
B. Director, Office of Policy Planning
   - Michael Anton – Jan. 20, 2025 - present
C. Principal Deputy Director, Office of Policy Planning
   - Arthur Milikh
D. Assistant Secretary, Bureau of Population, Refugees and Migration (PRM)
   - Marta Costanzo Youth – Oct. 7, 2024 – Jan. 17, 2025
E. Deputy Assistant Secretary, Bureau of Population, Refugees and Migration (PRM)
   - Scott Turner – Mar. 28, 2022 - present
F. Principal Deputy Assistant Secretary, Bureau of Population, Refugees, and Migration (PRM)
   - Jennifer Davis – Dec. 17, 2024 - present
G. Senior Bureau Official, Bureau of Western Hemisphere Affairs
   - Michael Kozak – Jan. 20, 2025 - present
H. Special Representative for Venezuela (or Venezuela Subject Matter Expert(s))

E. White House

A. Deputy Chief of Staff
   - Stephen Miller

II.   Plaintiffs' Proposed Search terms[4]

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[4] Defendants have not and are not now stipulating to the production of ESI based upon these terms.

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A. For both decisions:
- ["Temporary Protected Status" or TPS or 1254a] and [Venezuela]
- ["Temporary Protected Status" or TPS or 1254a] and [Trump or POTUS or President or "Executive Order" or "EO" or "White House" or "America First"]
- ["Temporary Protected Status" or TPS or 1254a] and [illegal]
- ["Temporary Protected Status" or TPS or 1254a] and [invasion]

B. For the vacatur decision:
- ["Temporary Protected Status" or TPS or 1254a] and [vacat*]
- ["Temporary Protected Status" or TPS or 1254a] and [confus*]
- ["Temporary Protected Status" or TPS or 1254a] and ["January 17" or Mayorkas]

C. For the termination decision:
- ["Temporary Protected Status" or TPS or 1254a] and [terminat*]
- ["Temporary Protected Status" or TPS or 1254a] and [national interest]
- ["Temporary Protected Status" or TPS or 1254a] and ["Tren de Aragua" or "Tren de Agua" or TdA]

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Appendix B

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3   All requested fields are to be included in the data load file whether populated or not, with the exception of fields that are blank for the entirety of a production (e.g., fields specific to Microsoft Office applications where the producing party does not use Microsoft Office applications). A check mark indicates the record types to which the field normally applies. "Other ESI" includes ESI other than emails, calendars, and messages. The parties will meet and confer about any field which cannot be populated automatically (i.e. would require manual population of information).

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Field name[5]	Field Description	Field Type	Field Value	Hard Copy	E-mail	Other ESI
COLLECTION SOURCE	Name of the Organization data was collected from	Text	160	✓	✓	✓
SOURCE ID (BOX #)	Submission/volume/box number	Text	10	✓	✓	✓
DUPECUSTODIAN	Custodian/Source – all custodians who had the document before de-duplication; format: Last, First or ABC Dept.	Text – semicolon delimited	Unlimited		✓	✓
AUTHOR	Creator of the document	Text	500			✓
BEGDOC#	Start Bates (including prefix) - No spaces	Text	60	✓	✓	✓
ENDDOC#	End Bates (including prefix) - No spaces	Text	60	✓	✓	✓
DOCID	Unique document Bates # or populate with the same value as Start Bates (DOCID = BEGDOC#)	Text	60	✓	✓	✓
PGCOUNT	Page Count	Number	10	✓	✓	✓
GROUPID	Contains the Group Identifier for the family, in order to group files with their attachments	Text	60		✓	✓

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25   [5] Defendants are determining whether their standard eDiscovery production specifications use different field names. To the extent Defendants' standard eDiscovery production specifications use different field names, they may use that different standard field name for production. To the extent Defendants use a field name different from the field name identified in this protocol, they must notify Plaintiffs and provide a cross reference between the protocol-identified data field name and the data field name Defendants will use for production. Nothing about this stipulation is intended to alter the information to be provided separately for each field as described.

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Field name[5]	Field Description	Field Type	Field Value	Hard Copy	E-mail	Other ESI
PARENTID	Contains the Document Identifier of an attachment's parent	Text	60		✓	✓
ATTACHIDS	Child document list; Child DOCID or Child Start Bates	Text – semicolon delimited	Unlimited	✓	✓	✓
ATTACHLIST	List of Attachment filenames	Text – semicolon delimited	Unlimited		✓	✓
BEGATTACH	Start Bates number of parent	Text	60	✓	✓	✓
ENDATTACH	End Bates number of last attachment	Text	60	✓	✓	✓
RECORD TYPE	Use the following choices: Image, Loose E-mail, E-mail, E-Doc, Attachment, Hard Copy or Other. If using Other, please specify what type after Other	Text	60	✓	✓	✓
FROM	Sender (i.e.: e-mail address, Last name, First name)	Text	160		✓	✓
TO	Recipient (i.e.: e-mail address, Last name, First name)	Text – semicolon delimited	Unlimited		✓	✓
CC	Carbon Copy Recipients (i.e.: e-mail address, Last name, First name)	Text – semicolon delimited	Unlimited		✓	✓
BCC	Blind Carbon Copy Recipients (i.e.: e-mail address, Last name, First name)	Text – semicolon delimited	Unlimited		✓	✓
SUBJECT	Subject line of email	Text	Unlimited		✓	
TITLE	Document Title	Text	Unlimited			✓
CONVINDEX	E-mail system ID used to track replies, forwards, etc.	Text	Unlimited		✓	

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Field name[5]	Field Description	Field Type	Field Value	Hard Copy	E-mail	Other ESI
DOCDATE	Last Modified Date for files and Sent date for e-mail, this field inherits the date for attachments from their parent. Hard copy document date field to be provided for any hard copy documents that have coded date fields.	Date	MM/DD/YYYY	✓	✓	✓
DATE TIME SENT	Date and time Sent (USE TIME ZONE OF COLLECTION LOCALITY) Numbers must be populated.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
DATE TIME CRTD	Date Created (USE TIME ZONE OF COLLECTION LOCALITY) Numbers must be populated.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
DATE TIME SVD	Date Saved (USE TIME ZONE OF COLLECTION LOCALITY) Numbers must be populated.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
DATE TIME MOD	Date Last Modified (USE TIME ZONE OF COLLECTION LOCALITY) Numbers must be populated.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
DATE TIME RCVD	Date Received (USE TIME ZONE OF COLLECTION LOCALITY) Numbers must be populated.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	

STIPULATED ORDER RE: DISCOVERY OF ELECTRONICALLY STORED INFORMATION
CASE NO. 3:25-CV-01766-EMC

Field name[5]	Field Description	Field Type	Field Value	Hard Copy	E-mail	Other ESI
DATE TIME ACCD	Date Accessed (USE TIME ZONE OF COLLECTION LOCALITY) Numbers must be populated.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
TIME ZONE OFFSET	Time zone of collection locality, relative to Coordinated Universal Time (UTC).	Decimal	10		✓	✓
FILE SIZE	Native File Size in KBs	Decimal	10			✓
FILE NAME	File name - name of file as it appeared in its original location	Text	Unlimited			✓
APPLICATION	Application used to create native file (e.g. Excel, Outlook, Word)	Text	160		✓	✓
FILE EXTENSION	Extension for the file (e.g. .doc, .pdf, .wpd)	Text	10		✓	✓
FOLDER ID	Complete E-mail folder path (e.g. Inbox\Active) or Hard Copy container information (e.g. folder or binder name)	Text	Unlimited	✓	✓	✓
ATTACHMCOUNT	Number of attachments (any level child document) associated with a ParentID	Text	10		✓	✓
FILE TYPE	Description that represents the file type to the Windows Operating System. E.g., Adobe Portable Document Format, Microsoft Word 97 – 2003, or Microsoft Office Word Open XML Format.	Text	160		✓	✓
MESSAGE TYPE	Exchange Message class or equivalent	Text	60		✓	✓
EXTENDED PROPERTIES		Text	Unlimited		✓	✓

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Field name[5]	Field Description	Field Type	Field Value	Hard Copy	E-mail	Other ESI
HAS REDACTIONS	Identifies whether a record has been produced with redactions; should be populated with Y for records with redactions and N for records without redactions.	Text	Yes/No	✓	✓	✓
HAS TRANSLATIONS	Identifies whether a document has been produced with translated text or audio contains a transcript	Text	Yes/No	✓	✓	✓
LAST AUTHOR	The Last User to save the file populated in the electronic file metadata	Text	Unlimited		✓	✓
MESSAGEID	Proprietary email database/mailstore/post office file associated with centrally managed enterprise email servers. Microsoft Outlook PST EntryID, the UniqueID (UNID) for Lotus Notes, equivalent value for other proprietary mailstore formats.	Text	Unlimited		✓	✓
INTERNETMSGID	Globally unique identifier for a message which typically includes messageid and a domain name. Example: <0E6648D558F338179524D555@m1p.innovy.net	Text	Unlimited		✓	✓
FILEPATH	File path to native file as it existed in original environment	Text	Unlimited		✓	✓
DATEAPPTSTART	Start date of calendar appointment. Format: YYYYMMDD.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
TIMEAPPTSTART	Start time of calendar appointment. Format: HH:MM:SS (use 24 hour times, e.g., 13:32 for 1:32 pm; timezone indicators cannot be included)	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
DATEAPPTEND	End date of calendar appointment. Format: YYYYMMDD.	Date and Time	MM/DD/YYYY HH:MM:SS		✓	✓
TIMEAPPTEND	End time of calendar appointment. Format:	Date and Time	MM/DD/YYYY		✓	✓

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Field name[5]	Field Description	Field Type	Field Value	Hard Copy	E-mail	Other ESI
	HH:MM:SS (use 24 hour times, e.g., 13:32 for 1:32 pm; timezone indicators cannot be included)		HH:MM:SS			
EMAIL IMPORTANCE	Importance designation assigned to the email (i.e., High, Normal, Low)	Text	20		✓	
EMAIL SENSITIVITY	Sensitivity designation assigned to the email (i.e., Confidential, Sensitive, Normal)	Text	20		✓	
DOCUMENT COMMENTS	Any Comments values populated in the electronic file metadata	Text	Unlimited			✓
HASHMD5	Document MD5 hash value (used for deduplication or other processing)	Text	Unlimited	✓	✓	✓
HASHSHA	Document SHA1 hash value (used for deduplication or other processing)	Text	Unlimited	✓	✓	✓

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